REMARKS

Claims 1-32 are pending. Claims 1, 7, 9, 16, 22, 23, 30 and 31 are independent. In the Office Action, Claims 1, 3-7, 10-16 and 18-32 were rejected under 35 U.S.C. § 103(a), as allegedly unpatentable over U.S. Patent No. 6,175,922 (Wang) in view of U.S. Patent No. 6,219,694 (Lazaridis). Claims 2, 8, 9 and 17 were rejected under 35 U.S.C. § 103(a), as allegedly unpatentable over Wang in view of Lazaridis, and further in view of U.S. Patent No. 6,296,336 (Ladd). Claims 1 and 5 are hereby amended to correct a minor typographical error, and Applicants submit that the corrections do not change the scope of the claims and do not require further search. Applicants respectfully traverse the above-described rejections.

The arguments made previously with respect to Wang are repeated and incorporated by reference herein.

Applicants traverse the combination of Wang and Lazaridis as a basis of rejection and submit that the combination is improper. It is not proper to engage in a hindsight reconstruction of the claimed invention using the Applicants' structure as a template and selecting elements from references to fill in the gaps. Applicants submit that the combination of Wang and Lazaridis is based on impermissible hindsight. Furthermore, it is well settled that prior art may not be gathered with the claimed invention in mind. See, Patentec, Inc. v. Graphic Controls Corp., 776 F.2d 309, 227 USPQ 766 (Fed. Cir. 1985). Applicants submit that one of ordinary skill in the art would not reasonably have been motivated to

combine an electronic transaction system, as disclosed in Wang, with a system that enables a mobile device and a host system to have a common electronic address, as disclosed in Lazaridis. Applicants respectfully disagree with the motivation provided in the Office Action since a message redirected to a mobile station does not relate to an electronic transaction requiring approval. Thus, Applicants submit that the combination of Wang and Lazaridis is improper and respectfully request that the rejections based on that combination be withdrawn.

In addition to the combination of Wang and Lazaridis being improper, Applicants further submit that the claims are not rendered unpatentable by Wang or Lazaridis, taken alone or in combination.

The aspect of the present invention, set forth in independent Claim 1, is directed to a method for conducting electronic commerce. The method includes operating a computer to contact a commerce-related site using a browser. The presence of a message that is received from a commerce-related site is automatically detected. The message requires, as a response, an authentication of a user. In response to automatically detecting the presence of the message, a message is sent from the computer to a mobile station over a link. In response to receiving the message over the link, a user authentication message is generated in the mobile station. The user authentication message is passed from the mobile station to the computer over the link. The user authentication information is then sent from the computer to the commerce-related site using the browser.

As understood by Applicants, Wang relates to a method and apparatus for approving a transaction request between an electronic transaction

system and a portable electronic authorization device (PEAD) carried by a user. The PEAD uses an electronic service authorization token. Transaction approvals occur entirely within PEAD 200 using the user identification data and/or the user's private encryption key that are always kept secure within PEAD 200.

As understood by Applicants, Lazaridis relates to a system and method for pushing information from a host system to a mobile data communication device upon sensing a triggering event. A redirector program operating at the host system enables a user to continuously redirect certain user-selected data items from the host system to the user's mobile data communication device upon detecting a user-defined triggering event. Lazaridis teaches that either the PC or the mobile device can fulfill a particular task independent of the other. Either device can be used to receive the messages and respond to the messages.

Applicants submit that nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest automatically detecting the presence of a message received from a commerce-related site that requires, as a response, an authentication of a user, and in response to automatically detecting the presence of the message, sending a message from the computer to a mobile station over a link, and in response to receiving the message over the link, generating a user authentication message in the mobile station, as recited in independent Claim 1.

Moreover, the Examiner has admitted that Wang fails to teach automatically detecting a message sent from an Internet site. (Office Action, Page

3, lines 16-20) Applicants submit that the redirection of an email, where a host system and a mobile device share a common electronic address, as disclosed in Lazaridis, fails to provide the necessary teaching that is missing in Wang.

Also, Applicants note that Claim 1 recites that the computer and the mobile station function in combination with each other and not independently, as disclosed in Lazaridis. Therefore, Applicants submit that not only does Lazaridis fail to provide the necessary teaching that is lacking in Wang, Lazaridis teaches away from Applicants' claimed invention by teaching that the PC and the mobile device function independently of one another. Accordingly, Applicants submit that Claim 1 is allowable.

Independent Claim 7 recites, *inter alia*, a computer and a browser that automatically detect the presence of a received message from a site that requires a response from a user. The message is sent from the computer to a mobile station and a user response message is generated at the mobile station and passed to the computer.

Applicants submit, as stated above, that the combination of Wang and Lazaridis is improper and does not provide the basis of a *prima facie* case of obviousness. Furthermore, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest a computer and a browser automatically detecting the presence of a received message from a site that requires a response from a user, sending the message to a mobile station and generating a user response message at the mobile station, as recited in Claim 7. Therefore, Applicants submit that Claim 7 is allowable.

Independent Claim 16 recites, *inter alia*, automatically detecting with the computer a presence of a received message from the site that requires a response from the user and in response to automatically detecting the presence of the received message, sending a message from the computer to the mobile station over a bidirectional link , generating a user response message and passing the user response message to the computer over the link.

Applicants submit, as stated above, that the combination of Wang and Lazaridis is improper and does not provide the basis of a *prima facie* case of obviousness.

Furthermore, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest automatically detecting with the computer a presence of a received message from the site that requires a response from the user and in response to automatically detecting the presence of the received message, sending a message from the computer to the mobile station over a bidirectional link, as recited in Claim 16. Therefore, Applicants submit that Claim 16 is allowable.

Independent Claim 22 recites, *inter alia*, automatically detecting the presence of a received challenge from a site, the challenge being detected based on message parsing that includes Multi-Purpose Internet Mail Extensions (MIME) field recognition. Claim 22 also recites generating a response to the challenge and transmitting the response to the computer over the link, where generating the response comprises prompting the user to enter personal identification information

using an interface and operating a user authentication module in the mobile station to validate the personal information.

As stated above, Applicants submit that the combination of Wang and Lazaridis is improper and does not provide the basis of a *prima facie* case of obviousness.

Furthermore, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest, automatically detecting the presence of a received challenge from a site, the challenge being detected based on message parsing that includes Multi-Purpose Internet Mail Extensions (MIME) field recognition, as recited in Claim 22.

Additionally, Applicants submit that nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest generating a response to the challenge and transmitting the response to the computer over the link, where generating the response comprises prompting the user to enter personal identification information using an interface and operating a user authentication module in the mobile station to validate the personal information, as recited in Claim 22. Therefore, Applicants submit that Claim 22 is allowable.

Independent Claim 23 recites, *inter alia*, automatically detecting the presence of a received request from a site and sending an inquiry to the mobile station from the computer for a list of certificates that are accessible by the mobile station and applicable to the request by presenting the list of applicable certificates to the user for selecting one of the presented certificates by using the

mobile station to communicate with a source of the selected certificates and passing the completed certificate to the browser and responding to the request received from the site.

As stated above, Applicants submit that the combination of Wang and Lazaridis is improper and does not provide the basis of a *prima facie* case of obviousness.

Furthermore, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest, automatically detecting the presence of a received request from a site and sending an inquiry to the mobile station from the computer for a list of certificates that are accessible by the mobile station. Also, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest sending an inquiry to the mobile station from the computer for a list of certificates that are applicable to the request or presenting the list of applicable certificates to the user for selecting one of the presented certificates, as recited in independent Claim 23. Therefore, Applicants submit that Claim 23 is allowable.

Claim 30 recites, *inter alia*, a controller that is responsive to automatic detection of the presence of a received request from a server for a list of mobile station accessible certificates that apply to the request and the controller returns a list of applicable certificates and responsive to a user selecting one of the certificates, communicates with the source of the selected certificate to complete the certificate. The completed certificate is passed to the network access application to respond to the request received from the server.

As stated above, Applicants submit that the combination of Wang and Lazaridis is improper and does not provide the basis of a *prima facie* case of obviousness.

Furthermore, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest a controller that is responsive to automatic detection of the presence of a received request from a server for a list of mobile station accessible certificates that apply to the request and the controller returns a list of applicable certificates and responsive to a user selecting one of the certificates, communicates with the source of the selected certificate to complete the certificate. Applicants also submit that nothing has been found in Wang or Lazaridis that would teach or suggest that the completed certificate is passed to the network access application to respond to the request received from the server, as recited in Claim 30. Therefore, Applicants submit that Claim 30 is allowable.

Independent Claim 31 recites, *inter alia*, automatically detecting the presence of a request that is received from a server, the request requiring an authentication of a user, in response to automatically detecting the presence of the request, sending a message from the computer to a mobile station over a link, and in response to receiving the message, generating a user authentication message in the mobile station.

As stated above, Applicants submit that the combination of Wang and Lazaridis is improper and does not provide the basis of a *prima facie* case of obviousness.

Furthermore, nothing has been found in Wang or Lazaridis, taken alone or in combination, that would teach or suggest automatically detecting the presence of a request that is received from a server, the request requiring an authentication of a user and in response to automatically detecting the presence of the request, sending a message from the computer to a mobile station over a link, and in response to receiving the message, generating a user authentication message in the mobile station, as recited in Claim 31. Therefore, Applicants submit that Claim 31 is allowable.

Independent Claim 9 recites, *inter alia*, a computer and a browser operating to automatically detect the presence of a received message from a site that requires a response from a user, and further comprising an interface for sending a message from the computer to the mobile station over a link in response to automatically detecting the presence of the message.

As understood by Applicants, Ladd relates to a markup language to provide interactive services. A markup language document includes a dialog element including a plurality of markup language elements. Each of the plurality of markup language elements is identifiable by at least one markup tag. A step element is contained within the dialog element to define a state within the dialog element.

As stated above, Applicants submit that the combination of Wang and Lazaridis is improper. Therefore, the combination of Wang, Lazaridis and Ladd is also improper, and fails to provide a basis for a *prima facie* case of obviousness.

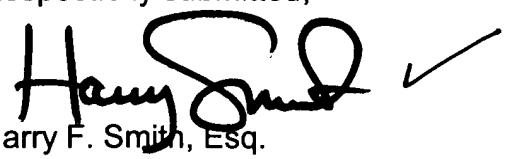
Furthermore, Applicants submit that nothing has been found in Wang or Lazaridis or Ladd, taken alone or in combination, that would teach or suggest the features recited in independent Claim 9. Specifically, Applicants submit that the combination of references fail to teach or suggest a computer and a browser operating to automatically detect the presence of a received message from a site that requires a response from a user, and further comprising an interface for sending a message from the computer to the mobile station over a link in response to automatically detecting the presence of the message, as recited in independent Claim 9. Accordingly, Applicants submit that Claim 9 is allowable.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request entry of this Response and early passage to issue of the present application.

Applicants' attorney may be reached by telephone at (203) 925-9400. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,



2/4/2003
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VERSION SHOWING MARKED REVISIONS

1. (Amended) A method for conducting electronic commerce, comprising steps of:

operating a computer to contact a commerce-related site using a browser;

automatically detecting a presence of a message received from the commerce-related site that requires, as a response, an authentication of a user;

in response to automatically detecting the presence of the message, sending a message from the computer to a mobile station over a link;

in response to receiving the message over the link, generating a user authentication message in the mobile station;

passing the user authentication message from the mobile station to the computer over the link; and

sending user authentication information from the computer to the commerce-related site using the browser.

5. (Amended) A method as in claim 1, wherein the steps of automatically detecting a presence of the received message and sending the message from the computer to the mobile station include a step of operating [an] a browser module.